

REMARKS

Claims 14, 16-18 and 21-26 are rejected under are rejected under 35 U.S.C. 102(e) as being anticipated by Naqvi et al. (6,625,449). With respect to claims 14 and 23, the Examiner asserts that "Naqvi et al. discloses a method for use in establishing a group call wherein detecting a group call from a first MS in a first proxy switch, informing the group call request and retrieving info from a list of members of the group in the second proxy switch, and establishing a group call between a first and second MS based on the retrieved info (abstract, col. 3/ln. 66-col. 4/ln. 39, col. 8/ln. 38-col. 10/ln. 20)."

Applicants respectfully disagree. In order for a reference to anticipate a claim, the reference must teach every aspect of the claimed invention either expressly or impliedly. Any feature not directly taught must be inherently present. See MPEP 706.02. Naqvi et al. does not teach the claim 14 limitations (and similar claim 23 limitations) of "Informing a second proxy switch of the group call request" and thus does not teach the subsequent limitations of "in the second proxy switch, retrieving information from a list of members of a group call group" and "based on the retrieved information, establishing a group call between first and second mobile stations (MS) via the first and second proxy switches." The Examiner has misinterpreted the art. Naqvi et al. does not teach a method involving communication between multiple (i.e., first and second) proxy switches. Further Naqvi et al. does not teach or suggest a method of group calling wherein a second proxy switch retrieves information from a list of members of a group call group. In fact, at col. 3/ln. 66 – col. 4/ln. 39, Naqvi et al. teaches switching operations in a communication system to allow communication traffic to be siphoned to or from an alternate network. At col. 8/ ln. 38 – col. 10/ln. 20, Naqvi et al. teaches, in more detail, the switching operations of a proxy switch when it receives a call. Depending on the application and the corresponding logic, in one example provided, the proxy switch may route the call to a MSC in the current network for handling or the proxy switch may handle the call itself, acting as a MSC for an alternate network.

As per claims 16-18, the Examiner states that Naqvi et al. discloses "that based on a history of group call determining to establish multicast session,

predicting future demand, or determining a topology of multicast sessions (col. 6/ln. 35-53, col. 8/ln. 38-col. 10/ln. 20)." Again, Applicants respectfully disagree. The cited sections of Naqvi et al. do not disclose a method of group calling or establishing multicast sessions (sessions between a single sender and multiple receivers in a network). Col. 6, Ins. 35-53 discloses ways of distributing the traffic load of MSCs in a communication system. As stated above, col. 8/ln. 38-col. 10/ln. 20 discloses actions of a proxy switch when it receives a call.

In view of the foregoing remarks, Applicants submit that independent claims 14, 16 and 23 are in condition for allowance. Applicants also submit that dependent claims 17, 18, 21, 22 and 24-16 are allowable by virtue of their dependency on the independent claims. Applicants respectfully request the withdrawal of the final rejection and the timely allowance of the pending claims.

Please charge any fees associated herewith, including extension of time fees, to 50-2117.

Respectfully submitted,
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